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FAX COVER SHEET

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MESSAGE: Here are my comments on the PRC 42/
CSLC EIR # 732

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COMMENTS OF Ingeborg Cox, M.D.

PRC 421 has not been active for more than 10 years. The draft EIR shows 17 Class I impacts if this site is reactivated, as proposed by Venoco, Inc.

The 6-inch Pipeline in 1994 released 170 barrels of oil. This line is not suitable to modern "pigging" maintenance due to the fact that it has two, 90-degree bends. (4-42)

In its proposed design, there is **no mechanism for detecting a break or leak** in the 6-inch pipeline. Such damage could go undetected due to the lack of leak detection systems for the outer containment vessel. (4-79)

For the 2-inch flow line, the design does not currently include a means of detecting low pressure, which is important if the 6-inch casing gets compromised (4-61)

The proposed 2-inch flow line would have a maximum operating pressure of 415 psig, this pressure goes beyond that of Line 96 (285 psig) and risks a rupture of this line.

In PRC 421-2 the caisson has not been repaired or upgraded and shows signs of degradation and wear. According to the report the Pier was reinforced in 2000 (4-42). Why was the caisson not taken care of then? PRC 421-2 exposure to wave action could potentially result in oil and gas leakage. (4-61)

Blowouts have the potential to occur in sub surface areas below the caisson deck. Such blowouts would not be contained by the well cellar and therefore could be potentially released directly into the ocean.

The well cellar has a volume of 213 barrels (8,946 gallons). The actual condition and construction of the well cellar is unknown (4-59, 60, and 61). Where are the permits for the construction, if they are lost then Venoco needs to apply for a brand new project. Why is a structure with obvious deficiencies allowed to be considered for restarting?

Also Separators are not typically used for projects located in the surf zone, so why are they even considered in this proposal?

According to the report no "as built plans" were provided by Venoco for the seawall and older portions of the caissons and no "load calculations" are available for the new walls. The report states that the present stability of the piers, caisson and seawall was impossible to fully ascertain. (4-62)

Who has the plans, why were they not provided and why is a project even considered without knowing the stability of the piers, caisson and seawall?

The caisson walls have been subject to over 75 years of weathering. (4-62) The unprotected seaward facing side wall of Caisson 421-2 shows signs of wear and tear. There are smaller cracks and irregularities, one of which appears to be very slow oily seep or sulfurous fluid. (4-64)

Between Piers 421-1 and 421-2 the seawall consists of the original timber bulkhead which has not been reinforced and thus is considered marginally stable (4-66). A large storm could result in total failure of the wall (4-66) and most likely in the case of an earthquake this wall could also fail.

The public could face potentially hazardous conditions if hydrocarbons or sulfur leaks occurred from the sides of caisson structures, as happened recently from the side of 421-1 and the seaward side of 421-2 (4-76)

The report states : Proposed safety mitigations may require that all six non seaward facing walls on Caissons 421-1 and 421-2 undergo reinforcements which should include construction of walls similar to that proposed for the seaward facing side of 421-2 (4-219). The word may should be changed to shall to make it mandatory, if this proposal goes forward.

Earthquake loading appears to not have been considered in the design of these structures. (4-64) Structures have suffered substantial collapse of the seaward-facing walls twice in the last 25 years. Why is the extent and quality of these repairs not clearly documented? (4-64) Is the substantial collapse of the seaward-facing walls not enough evidence that the whole project needs to be started from scratch, if it is going to be allowed?

At peak production, the proposed Project would increase throughput of the EMT by up to 700 BOPD (4-83). This increases the potential for a release of oil or hazardous materials making it a Class I impact. (4-84)

The increase in transfers from 23 to 88 only increases the potential of a loading spill. Why do you want to subject the population living in the area to an oil spill?

PRC 421 is a "sweet crude" H₂S content 10 parts per million (4-48)

According to Ellenhom's Medical Toxicology The odor threshold for H₂S is at 0.02 ppm. At 100 ppm there is loss of smell in 3 to 15 minutes. At 500 ppm-1000 ppm it acts primarily as a systemic poison causing death through respiratory paralysis. At exposures above 20ppm the following have been reported: changes in personality, intellect and memory. Eye and respiratory irritation, gastrointestinal disorders, decreased libido and backache. (Ann. Occup. Hygiene Vol 34 1990)

The draft EIR states that the likelihood of an explosion related to a crude oil spill and fire is "virtually nonexistent" therefore the EMT analysis did not conduct further analysis on explosions (4-49). Why is it that an explosion is unlikely in this scenario? If there is even a remote possibility of an explosion a complete analysis should be mandatory.

Since 1999, 10 release drills were held. None of the drills specifically addressed PRC 421. (4-50). Why was PRC not addressed in the drills?

Also Fire Prevention for the PRC 421 facilities are not specifically addressed in this plan (4-51) A fire is a big event and needs to be addressed.

Barge Jovalan is single-hulled and now does 23 transfers annually, under the permitted scenario the transfers would increase to 88. Increase in loading operations also would increase the frequency of spills to the environment. Why is this being allowed?

The Santa Barbara Oil Spill of 1969 was estimated at 80,900 barrels (4-236)

The barge has a reasonable worst case discharge of 14,000 bbls (588,000 gallons) and a catastrophic discharge of 56,000 bbls (2,352,000 gallons). We need to avoid at all costs such a potential catastrophe. As recent as last week in the news, there was another major oil release into San Francisco Bay waters.

Additional barge traffic increases the chances that a marine mammal could be injured by collision with a vessel. From 1990 to 1998 seven vessel strikes of gray whales were documented. Recently we had three blue whales die off our coast. One had a definite vessel encounter.

There does not appear to be an existing marine mammal contingency plan for the barge Jovalan (4-234). Why is this?

The Project site has had releases in 1994, two in 2000, one 2001, one in 2004 (4-110 - 112). Has this been taken into consideration?

Under the No Project alternative with Pressure testing, it states that potential effects of decommissioning the facilities would be evaluated in a separate analysis. Why is the analysis not presented now? The No Project alternative is misleading as they would have temporary production of oil (6-12 months in duration)

What are the practical applications for the CSLC (4-91) on the pressure testing?

Produced water disposal

The report states that separated water would be discharged into the well that the EOF uses for disposal of Holly's produced water (4-93) Where is the final destination of this contaminated water?

Ellwood Full Field and PRC 421 projects are interrelated in that they are overlapping facilities and could create similar impacts within the Ellwood area. The areas that could be impacted are:

ESHA's

Coal Oil Point ESHA

Kelp beds between Jalama and Carpinteria ESHA

Naples Harbor Seal Rookery

Wetlands:

Bell Canyon Crock, Tecolote Creek, Deveroux Slough

Noise:

Noise from pile driving is typically between 81 and 96 decibels. Drilling rigs may produce noise up to 174 dB (4-224) Pile driving and drilling have the potential to exceed the 160 dB limit (4-224)

These levels of noise are quite large. I do not see any maps indicating how far the noise will travel.

Fire

According to the report the ideal firefighter- to- population ratio is one firefighter for every 2000 in population.

The current ratio of firefighter to population in the area is 1 per 4,909 (and this number has most likely increased as more development projects are in the pipeline for the Hollister Ave. stretch that also will be used by Venoco) The current ratio is over the absolute maximum of 1 firefighter per 4000 in population.

The most underserved area in the city of Goleta is the extreme western portion which encompasses the Project location. Venoco needs to contribute toward the costs of a new Fire Station. And no further extension of Venoco's facilities should be allowed until there is adequate fire fighter to population ratio. At the present time the facility is outside the standard safe response time of 5 minutes. (4-319)

Venoco does not have a fire protection plan specific to the PRC 421. Operating PRC 421 without an approved fire protection plan will result in an unsafe situation. Also PRC 421 will not be staffed with on-site personnel. Why is this?

Emergency Management System:

Where is the Incident Command System located?

Venoco onsite response techniques are built upon the equipment and manpower resources available at the EOF. This is too arbitrary. A definite number should be required.

At night 2-3 people, 10-12 people during the day. (4-314) What happens in the event of a fire at night?

Traffic

Currently the intersection of Hollister Ave and Storke Road operates at LOS C and is projected to decline to LOS F with addition of cumulative traffic.

The Route between the EMT and the EOF on Storke Road has the impacts of Francisco Torres Student Housing and also Isla Vista School.

No increase in traffic should be allowed in this area as the level will deteriorate further to F impacting the public in the area.

In 2004 the caisson repair at PRC 421 required 60 tractor trailer one-way trips and 88 round trips.

Construction traffic was estimated at 40-60 trips during intensive construction period.

The Applicant has not prepared a traffic management plan and precise estimates of construction related traffic are unavailable. Why is this? (4-334)

The access Road with Hollister at Bacara has non standard alignment. (4-337). Combined with the unusual turning radius it could expose large slow heavy trucks completing this turning movement to fast moving traffic with limited views, creating short term potentially significant safety impacts (4-337)